

The ARRL has the right idea with the proposed refarming of the Amateur novice bands. The ARRL proposal, however, does not go far enough.

The frequency allocations for CW will still be too large to justify if the ARRL proposal is carried out. Over time, the number of single sideband (SSB) users has increased significantly (it will continue to do so) while the importance of CW has declined significantly. The fact that government agencies have abandoned CW and that code requirements have been de-emphasized by the FCC illustrate this decline.

In pointing out the benefits of CW operation, CW users have noted its ability to occupy very little bandwidth. In my opinion, the ARRL (I am a member) is limiting its proposed restructuring of the bands in order to placate the old-timers who still enjoy CW and tend to resist change. While I have nothing against those who enjoy CW (I passed the 20wpm test to get my Extra), I think the FCC should be more forward-looking and practical. Space in the SSB portion of the bands is very limited while chunks of the CW portion are used at less than optimal levels. Some of the controversy and infighting that goes on in the SSB portion occurs due to simple overcrowding and turf wars, making Mr. Hollingsworth's enforcement job more difficult.

I realize that the ARRL has enormous influence with the Commission on amateur radio issues but I hope the Commission has the foresight to go back to the League and ask if their proposal isn't coming up a bit short. Otherwise they will be coming back in a few years to propose yet another restructuring. Thank you for your attention.